

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION
APRIL 2024 SESSION

UNITED STATES OF AMERICA) Criminal No. 7:24CR13
)
)
v.) **INDICTMENT**
)
)
RAHYEEM TYQUAN BAKER) **In Violation of:**
)
) 18 U.S.C. § 922(g)(1)

COUNT ONE

The Grand Jury charges that:

1. On or about January 25, 2022, in the Western District of Virginia, the defendant, RAHYEEM TYQUAN BAKER, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Romarm/Cugir, model Draco, 7.62mm, pistol (S/N: ROA21DG-2684), said firearm having been shipped and transported in interstate or foreign commerce.
2. All in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendants shall forfeit to the United States:
 - a. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).
2. The property to be forfeited to the United States includes but is not limited to the following property:

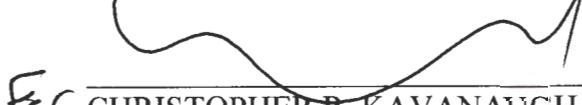
a. Firearm and Ammunition

- i. Romarm/Cugir, model Draco, 7.62mm, pistol (Serial Number ROA21DG-2684) and ammunition from within this firearm.
3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL this the 18 day of April 2024.

s/FOREPERSON
FOREPERSON


CHRISTOPHER R. KAVANAUGH
UNITED STATES ATTORNEY